

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRISTINE DEFRANCESCO,	:	Docket No. 18-CV-4032 (VSB)
	:	
Plaintiff,	:	DECLARATION OF LESLIE ZEMNICK
	:	
-against-	:	
	:	
MIRADOR REAL ESTATE, LLC,	:	
	:	
Defendant.	:	
-----X	:	

I, LESLIE ZEMNICK, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury, as follows:

1. During the period July 18, 2016 to February 23, 2018, I was employed by defendant Mirador Real Estate, LLC (“Mirador”) in the position of Director of Operations.

2. Plaintiff Christine DeFrancesco (“DeFrancesco”) was employed by Mirador from April 24, 2017 until November 22, 2017 in the position of Leasing Manager for Mirador’s Midtown East territory.

3. I was involved in Mirador’s hiring of DeFrancesco. Among other things, on April 20, 2017, I personally handed to DeFrancesco a complete copy of Mirador’s new employee paperwork package (the “New Hire Package”). Included in the New Hire Package was a copy of Mirador’s Alternative Dispute Resolution Program (the “ADR Program”).

4. At DeFrancesco’s request, I emailed her a copy of the New Hire Package, including, without limitation, the ADR Program, on April 24, 2017. Annexed hereto as Exhibit A is a copy of such April 24, 2017 email, including the New Hire Package attached thereto. In my April 24 email, I instructed DeFrancesco to “[p]lease populate the attached documents.”

5. Later on April 24, 2017, I met in person with DeFrancesco, at which meeting she personally handed to me documents from the New Hire Package that she had executed and/or completed. Such documents included the ADR Program signed by her.

6. Using a scanner in Mirador's office, I scanned and emailed to myself (in multiple emails) copies of the documents from the New Hire Package that DeFrancesco had completed. A copy of such email containing the ADR Program signed by DeFrancesco, dated April 24, 2017, is annexed hereto as Exhibit B.

7. By email dated April 24, 2017, I sent DeFrancesco's new hire paperwork, including the ADR Program signed by her, to Jose Berrios, who handles human resources for Mirador. A copy of such email and its attachments are collectively annexed hereto as Exhibit C.

8. Also on April 24, 2017, I countersigned the ADR Program signed by DeFrancesco. A copy of such fully-executed ADR Program is annexed hereto as Exhibit D. I sent such fully-executed ADR Program and the other original new hire documents for DeFrancesco to Mr. Berrios.

Dated: New York, New York  
October 23, 2018

  
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LESLIE ZEMNICK